



Pennsylvania Department of Conservation and Natural Resources

Rachel Carson State Office Building
P.O. Box 8767
Harrisburg, PA 17105-8767
December 6, 2002

**Office of Conservation and
Engineering Services**

Mr. Troy Brady
Surface Transportation Board
Case Control Unit
Washington, D.C. 20423

RE: Abandonment of the Enola Branch
Lancaster County, Pennsylvania
Docket No. AB-167 (Sub-No. 1095X)

Dear Mr. Brady:

The Department of Conservation and Natural Resources is identified as a potential consulting party in the Surface Transportation Board's Section of Environmental Analysis (SEA) October 24, 2002 Notice regarding the abandonment of the Enola Branch. The following comments are provided by DCNR in response to the Notice.

- 1. Identification of additional consulting parties:** The Department recommends that the Northeast Regional Field Office of the Rails-to-Trails Conservancy be added as a potential consulting party. The organization's address is - 105 Locust Street, Harrisburg, PA 17101. Please note that the Pennsylvania Bureau of State Parks is an agency within DCNR and can be removed as a separate consulting party, and the current Governor, Mark Schweiker, is leaving office on January 21, 2003. The Governor elect is Ed Rendell.
- 2. Any need for further assessment of adverse effects on the line:** The Department agrees with the Keeper's determination that the entire line is historic and that abandonment of the Enola Branch would adversely affect the line and the historic bridges, sites and other structures associated with the line. The Department is requesting that additional assessment of the line be considered for its value for a rails-to-trails corridor, open space preservation, outdoor recreation opportunities and a potential statewide significant greenway.
- 3. Appropriate mitigation measures:** The mitigation measures called for in the 1990s proposed MOA do not constitute appropriate mitigation at this time. Additional mitigation measures, other than the photographic documentation and video, need to be negotiated in light of the recent approval of a Statewide Greenways Plan, Pennsylvania Greenways: An Action Plan for Creating Connections, by then Governor Tom Ridge in

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August of 2001. DCNR, delegated the responsibility to implement the Plan, is currently identifying greenways that are considered to be more "statewide significant" and that will form the foundation for developing an interconnected system of greenways across the Commonwealth. The Enola Branch meets the criteria for statewide significance and the Department would suggest that a new MOA be negotiated that takes into consideration not only the historic significance of the line and bridges, but also the statewide significance of the line as a greenway corridor. The Department would want to be a party to the MOA negotiations.

4. **Methods or outlets for publicizing a proposed MOA:** Consider using a website and public meetings or presentations at various locations along the line. Of particular importance is a meeting with us and the Lancaster County Commissioners (and their Planning Commission) to discuss the other pertinent and relevant issues that have recently emerged and are set forth in comment number 5 below. This meeting should occur before a new MOA is drafted, if indeed one is.
5. **Any other pertinent issues relevant to this proceeding:**
 - We recognize that there is currently an Agreement of Sale between the railroad and the local municipalities; however, the Lancaster County Commissioners have expressed to DCNR a willingness to become the sponsor of the rail-to-trail project, and will work with the local municipalities and a non-profit trail group, the Southern End Community Association (SECA), to handle the ownership, disposition, liability and maintenance issues associated with the trail and the structures.
 - The Enola Branch line is identified for protection and development as a key recreational and open space asset in the County's Comprehensive Plan.
 - The Lancaster-York Heritage Region was designated by the Governor as a State Heritage Park in 2001, one of only eleven such designations in the state. The Enola Branch line is identified in their Management Action Plan as an extremely important resource to protect, enhance and market for heritage tourism development in the Lancaster-York Heritage Region.
 - As Indicated above, the Enola Branch line meets DCNR's criteria for being a statewide significant greenway and a "priority" trail.
 - DCNR and PennDOT have grant funds that can be requested by Lancaster County and the other project partners to help with the planning and acquisition of the greenway/trail, construction of it, and some limited maintenance of it. These funds are from a variety of state and federal sources and under the current project selection criteria for many of these funds this trail corridor would be a high priority for funding.

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- We agree with the Pennsylvania Department of Transportation that these proceedings before the STB be handled as expeditiously as possible.

We thank you for the opportunity to provide comments. If you need additional information or clarification, please contact Larry Williamson, Director of our Bureau of Recreation and Conservation, at 717-783-2659 or Martha Smith, Assistant Counsel, 717-772-4171.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Richard G. Sprenkle', is written over a horizontal line. The signature is stylized with loops and a long horizontal stroke extending to the right.

Richard G. Sprenkle
Deputy Secretary for
Conservation and Engineering Services
Department of Conservation and
Natural Resources

cc: Larry Williamson, Bureau of Recreation and Conservation
Martha Smith, Office of Chief Counsel